

## **EXHIBIT “E”**

## McGowan, Emmett

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**From:** Roh, Katriana G <kroh@paulweiss.com>  
**Sent:** Wednesday, March 28, 2018 11:36 PM  
**To:** McGowan, Emmett  
**Subject:** [EXTERNAL] RE: API Heat Transfer Inc. Document Subpoena in W.D.N.Y. Case 1:14-cv-0105-0-RJA-HKS American Precision Industries, Inc. v. Federal Insurance Company

Emmett-

While I am skeptical of the urgency of a request you have been silent on for over a year, and, as we had discussed previously, believe your inquiries are properly directed to counsel for plaintiff, per our discussion last year and without waiver of any objections, I am able to confirm on behalf of API Heat Transfer as follows:

API Heat Transfer Technologies Corporation merged with Heat Transfer Enterprises, Inc. as of July 11, 2007. The same day, Heat Transfer Enterprises merged into Heat Transfer Parent, Inc. (n/k/a API Group Intermediate Holding Company). API Heat Transfer Inc. was a wholly owned subsidiary of API Group Intermediate Holding Company.

Best,  
Kate

**Katriana G. Roh** | Associate  
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**From:** McGowan, Emmett [mailto:[mcgowan@mclolaw.com](mailto:mcgowan@mclolaw.com)]  
**Sent:** Tuesday, March 20, 2018 10:50 AM  
**To:** Roh, Katriana G <kroh@paulweiss.com>  
**Subject:** RE: API Heat Transfer Inc. Document Subpoena in W.D.N.Y. Case 1:14-cv-0105-0-RJA-HKS American Precision Industries, Inc. v. Federal Insurance Company

Ms. Roh: I am reaching out one more time in an attempt to secure API Heat Transfer Inc.'s response to the Subpoena to Produce Documents which was served on October 7, 2016. If we do not receive substantive responses within ten (10) days, we will have no choice but to utilize motions practice.

Emmett  
856-380-8936

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**From:** Roh, Katriana G [mailto:[kroh@paulweiss.com](mailto:kroh@paulweiss.com)]  
**Sent:** Wednesday, January 25, 2017 1:33 PM  
**To:** McGowan, Emmett  
**Subject:** RE: API Heat Transfer Inc. Document Subpoena in W.D.N.Y. Case 1:14-cv-0105-0-RJA-HKS American Precision Industries, Inc. v. Federal Insurance Company

Emmett-

Apologies, I was out sick yesterday. I have a series of meetings, but can I call you at 3:30? If that time does not work, please propose an alternative.

Best,  
Kate

**Katriana G. Roh** | Associate  
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**From:** McGowan, Emmett [<mailto:mcgowan@mclolaw.com>]

**Sent:** Tuesday, January 24, 2017 11:31 AM

**To:** Roh, Katriana G <[kroh@paulweiss.com](mailto:kroh@paulweiss.com)>

**Subject:** API Heat Transfer Inc. Document Subpoena in W.D.N.Y. Case 1:14-cv-01050-RJA-HKS American Precision Industries, Inc. v. Federal Insurance Company

Ms. Roh,

I am following-up again regarding API Heat Transfer Inc.'s ("Heat Transfer's") failure to respond to the Subpoena To Produce Documents which was served on Heat Transfer on October 7, 2016. As you know, Heat Transfer's response was due October 31, 2016. You and I discussed the Subpoena on November 17, 2016 and December 13, 2016. Despite these discussions, to date, we still have not received a response to the Subpoena. Please be advised that if we do not receive the documentation demanded in the Subpoena by close of business this Friday, January 27, 2017, we will have no choice but to file a motion to enforce the Subpoena.

Please do not hesitate to contact me if you would like to discuss.

Sincerely,  
Emmett

**Emmett E. McGowan, III**

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